



JOHN J. SANSONE  
COUNTY COUNSEL

THOMAS E. MONTGOMERY  
ASSISTANT COUNTY COUNSEL

NATHAN C. NORTHUP  
THOMAS J. HARRON  
CLAUDIA ANZÚRES  
DEBORAH A. MCCARTHY  
CHIEF DEPUTIES

# County of San Diego

## OFFICE OF COUNTY COUNSEL

COUNTY ADMINISTRATION CENTER  
1600 PACIFIC HIGHWAY, ROOM 355  
SAN DIEGO, CALIFORNIA 92101-2469  
(619) 531-4860 FAX (619) 531-6005

### DEPUTIES

C. ELLEN PILSECKER  
GEORGE W. BREWSTER JR.  
WILLIAM A. JOHNSON, JR.  
WILLIAM W. TAYLOR  
STEPHEN R. MAGRUDER  
MORRIS G. HILL  
ELLEN R. MICHAELS  
RICKY R. SANCHEZ  
TIMOTHY M. BARRY  
WILLIAM L. PETTINGILL  
JUDITH A. McDONOUGH  
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RODNEY F. LORANG  
DAVID J. SMITH  
THOMAS D. BUNTON  
ELIOT ALAZRAKI  
MIRIAM E. BREWSTER  
TERENCE G. DUTTON  
LAUREL G. TOBAR  
JANICE INGOLD LAU  
LAURIE J. ORANGE

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PAUL J. MEHNERT  
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LISA MACCHIONE  
KEVIN G. KENNEDY  
DAVID G. AXTMANN  
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MARY JO LANZAFAME  
ALEC S. BEYER  
DAVID BRODIE  
MARA W. ELLIOTT  
LEONARD W. POLLARD II  
STEPHANIE KISH  
THOMAS DEAK  
THOMAS L. BOSWORTH  
WALTER J. DE LORRELL III  
JAMES M. TOPPER  
RACHEL WITT  
CARRA L. RHAMY  
PATRICIA FUSCO  
B. GEORGE SEIKALY

February 9, 2007

Brian G. Lau  
Fair Political Practices Commission  
428 J Street, Suite 800  
Sacramento, CA 95814

Re: Proposed Amendment to Regulation 18944.2

Dear Mr. Lau:

This letter is written on behalf of the California State Association of Counties ("CSAC") Conflict of Interest Committee to express its support for proposed regulation 18944.2. The clarification that would allow a donor to make monetary payment for goods and services directly to the vendor is a very practical improvement which still preserves the principle that the gift must go to the agency for control and distribution rather than to the individual.

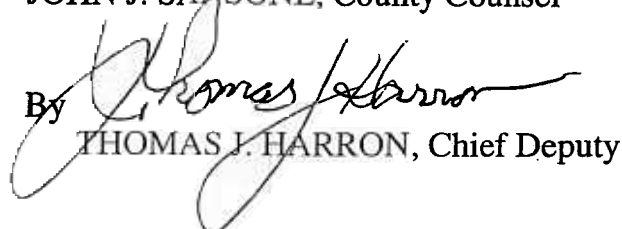
Many times these gifts to the agency involve a trip where a vendor is dealing with one travel agent in order to obtain a group rate, for example, a Chamber of Commerce may organize a trade trip or a trip to a sister city and it is convenient, once the County has designated who it will send, to have the Chamber deal directly with the travel agent to include the County representative.

Your proposed regulation would confirm the propriety of such an arrangement.

Very truly yours,

JOHN J. SANSONE, County Counsel

By

  
THOMAS J. HARRON, Chief Deputy

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PRACTICES COMMISSION